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RAINIERconnect

1417 Kreskv Ave Ste 1 | Centralia, WA 98531 | www.rainierconnect.com

February 28, 2009

Federal Communications Commission
Enforcement Bureau
Telecommunications Consumers Division
445 12th Street SW
Washington, DC 20554

RE: EB Docket No. 06-36
CPNI Certification for the year 2008
Mashell Telecom, Inc. d/b/a Rainier Connect
FCC Form 499 Filer ID: 803703

To Whom It May Concern:

Enclosed are two courtesy copies of Mashell Telecom, Inc.'s Revised CPNI Certification for the year 2008 as instructed in Public Notices DA 09-9 and DA 09-240.

Our certification was originally filed online at the FCC's ECFS on 02/19/09. The confirmation number 2009219250761. A revised filing, which we have enclosed, was filed on 02/28/09. The Confirmation number for the revised filing is 2009228266610.

Our original filing was pursuant to instructions included in DA 09-9, which did not require that courtesy copies be sent to the Enforcement Bureau. Since we are now aware of DA 09-240, which requires these copies, we are sending them today.

Sincerely,



Mark Carrier
Regulatory & Compliance Manager
Mashell Telecom, Inc. d/b/a Rainier Connect
PO Box 683
Centralia, WA 98531
360-623-4555 - Direct
360-388-6392 - Cell
mark.carrier@rainierconnect.net

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RAINIERconnect

1417 Kreskv Ave Ste 11 Centralia, WA 98531 | www.rainierconnect.com

February 28, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW Suite TW-A325
Washington DC 20554

RE: EB Docket No. 06-36
REVISED CPNI Certification for the year 2008
Mashell Telecom, Inc. d/b/a Rainier Connect
FCC Form 499 Filer ID: 803703

To Whom It May Concern:

Attached is Mashell Telecom, Inc.'s revised CPNI Certification for the year 2008 as instructed in Public Notice DA 09-240.

Our certification was originally filed online at the FCC's ECFS on 02/19/09. The confirmation number is 2009219250761.

There are two changes to this revised filing: First is the addition of this cover letter, which we originally did not realize might be required with electronic filings. The second is the addition of a second Certification statement by our Corporate Vice President of Finance & Accounting who oversees all regulatory compliance. This is in addition to the certification by myself, our company's CPNI Compliance Officer. The Certificate of Compliance remains unchanged.

Sincerely,


Mark Carrier

Regulatory & Compliance Manager
Mashell Telecom, Inc. d/b/a Rainier Connect
PO Box 683
Centralia, WA 98531
360-623-4555 - Direct
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CPNI CERTIFICATION
[Section 64.2009(e) of FCC Rules]

EB DOCKET NO. 06-36

I certify that I am an Officer of Mashell Telecom, Inc. d/b/a Rainier Connect.

FCC Form 499 Filer ID: 803703

I have personal knowledge that Rainier Connect [and its affiliates] established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules and requirements in Subpart U of Part 64 of the Federal Communications Commission's Rules (47 C.F.R. §64.2001 through 64.2011). The attached Statement of CPNI Compliance explains how the Company's operating procedures ensure that it is in compliance with the foregoing FCC rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI. If applicable, a summary of actions taken will be attached to this certification.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information). If applicable, a summary of customer complaints will be attached to this certification.

I am making this certification for the year 2008


Signature

Mark A. Carrier
Printed Name

Regulatory & Compliance Manager
Office Held

02-19-09
Date

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CPNI CERTIFICATION
[Section 64.2009(e) of FCC Rules]

EB DOCKET NO. 06-36

I certify that I am an Officer of Mashell Telecom, Inc. d/b/a Rainier Connect.


FCC Form 499 Filer ID: 803703

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I am making this certification for the year 2008



Signature

John Schaller

Printed Name

Vice President - Finance & Accounting

Office Held

2/25/09

Date

CERTIFICATE OF COMPLIANCE WITH PROTECTION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION RULES

Mark A. Carrier signs this Certificate of Compliance in accordance with Section 222 of the Telecommunications Act of 1996, as amended, 47 USC 222, and the FCC's Code of Federal Regulations (CFR) Title 47 §64.2009, on behalf of Mashell Telecom, Inc. d/b/a Rainier Connect. This Certificate of Compliance addresses the requirement of FCC's (CFR) Title 47 §64.2009 that the Company provide both a Certificate of Compliance and a statement accompanying the certificate" to explain how its operating procedures ensure compliance with FCC's (CFR) Title 47 §64.2001-2011.

On behalf of the Company, I certify as follows:

1. I am the Regulatory & Compliance Manager of the Company.

My business address is:

PO Box 683, 1417 Kresky Avenue, Suite #1
Centralia, WA 98531

2. I have personal knowledge of the facts stated in this Certificate of Compliance. I am responsible for overseeing compliance with the Federal Communications Commission's (FCC) rules relating to customer proprietary network information (CPNI).
3. The Company has established a system by which the status of a customer's approval for use of CPNI, as defined in 47 USC 222(h)(1), can be clearly established prior to the use of CPNI. The Company relies on the involvement of its high-level management to ensure that no use of CPNI is made until a full review of applicable law has occurred.
4. The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. However, Company personnel make no decisions regarding CPNI without first consulting with myself, Customer Service Manager, Kelly Wienholz or Marketing Manager, Debbie Reding. The Company has an express disciplinary process in place for personnel who make unauthorized use of CPNI.
5. The Company's policy is to maintain records of its own sales and marketing campaigns that use CPNI. The Company likewise maintains records of its affiliates' sales and marketing campaigns that use CPNI. The Company also maintains records of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. The Company maintains these records in its offices for a minimum of one year.
6. The Company's policy is to maintain records of customer approval for use of CPNI, as well as notices required by the FCC's regulations, for a minimum of one year. The Company maintains records of customer approval and disapproval for use of CPNI in a readily available location that is consulted on an as-needed basis.
7. The Company's policy is to maintain records of a CPNI breach for a minimum of two years. These records will include a description of the steps the company took to prevent

**CERTIFICATE OF COMPLIANCE WITH PROTECTION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION RULES (Cont'd)**

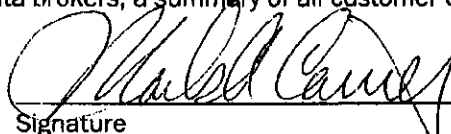
the breach, how the breach occurred, the impact of the breach and proof of notification to law enforcement and the customer, if applicable.

8. The Company has a supervisory review process regarding compliance with the FCC's rules relating to protection of CPNI for outbound marketing situations. The purpose of this supervisory review process is to ensure compliance with all rules prior to using CPNI for a purpose for which customer approval is required. Company personnel, prior to making any use of SPNI, must first consult with myself, Customer Service Manager, Kelly Wienholz, Customer Service Supervisor, Tanya Lane or Marketing Manager, Debbie Reding regarding the lawfulness of using the CPNI in the manner contemplated. In deciding whether the contemplated use of the CPNI is proper, Customer Service Manager, Kelly Wienholz, Customer Service Supervisor, Tanya Lane, Marketing Manager, Debbie Reding or I consult one or more of the following: the Company's own compliance manual, the applicable FCC regulations, the FCC's Compliance Guide, and, if necessary, legal counsel. The Company's sales personnel must obtain supervisory approval from Customer Service Manager, Kelly Wienholz, Customer Service Supervisor, Tanya Lane, Marketing Manager, Debbie Reding or I regarding any proposed use of CPNI.

9. Further, Customer Service Manager, Kelly Wienholz, Customer Service Supervisor, Tanya Lane, Marketing Manager, Debbie Reding and I personally oversee the use of opt-in, opt-out, or any other approval requirements, or notice requirements (such as notification to the customer of the right to restrict use of, disclosure of, and access to CPNI), contained in the FCC's regulations. We also review all notices required by the FCC regulations for compliance therewith.

10. Customer Service Manager, Kelly Wienholz, Marketing Manager, Debbie Reding and I also ensure that the Company enters into confidentiality agreements, as necessary, with any joint venture partners or independent contractors to whom it discloses or provides access to CPNI.

11. Customer Service Manager, Kelly Wienholz, Marketing Manager, Debbie Reding and I personally oversee completing and submitting EB Docket No. 06-36, which is due on or before March 1 each year. The form includes explanation of any action taken against data brokers, a summary of all customer complaints, and an explanation of breaches.


Signature

Mashell Telecom, Inc. d/b/a Rainier Connect
Company

02-19-09
Date